

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

TRISH MANGUAL ROLDAN

DEBTOR

CASE NO. 15-02360-BKT

CHAPTER 13

**DEBTOR'S MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

NOW COMES, TRISH MANGUAL ROLDAN, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated December 18, 2015, herewith and attached to this motion.

2. This Plan modification is filed to amend the Payment Plan Schedule in order to comply with the distribution of the confirmed Plan (docket #19) and cure the feasibility issue raised by the Trustee in his *Trustee's Position Regarding Urgent Motion Requesting Authorization for Loan* (docket #38).

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtor and to all creditors and interested parties appearing in the master address list, hereby attached.

Page 2

Case no. 15-02360-BKT13

Post confirmation modification of chapter 13 Plan

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of December, 2015.

/s/Roberto Figueroa Carrasquillo

ROBERTO FIGUEROA CARRASQUILLO

USDC 203614

ATTORNEY FOR PETITIONER

PO BOX 186 CAGUAS PR 00726

TEL 787-744-7699 FAX NO 787-746-5294

EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. **3:15-bk-2360**

MANGUAL ROLDAN, TRISH

Chapter **13**

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 12/18/2015		<input type="checkbox"/> AMENDED PLAN DATED: _____	
<input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION		Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
I. PAYMENT PLAN SCHEDULE		II. DISBURSEMENT SCHEDULE	
$\$ \underline{200.00} \times \underline{3} = \$ \underline{600.00}$		A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____	
$\$ \underline{220.00} \times \underline{9} = \$ \underline{1,980.00}$		B. SECURED CLAIMS:	
$\$ \underline{254.00} \times \underline{48} = \$ \underline{12,192.00}$		<input type="checkbox"/> Debtor represents no secured claims.	
$\$ \underline{\hspace{1cm}} \times \underline{\hspace{1cm}} = \$ \underline{\hspace{1cm}}$		<input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:	
$\$ \underline{\hspace{1cm}} \times \underline{\hspace{1cm}} = \$ \underline{\hspace{1cm}}$		1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS:	
TOTAL: \$ 14,772.00		Cr. First Bank De Puerto Cr. _____	
Additional Payments:		# Claim 5-1 # _____	
\$ _____ to be paid as a LUMP SUM		\$ 10,213.97 \$ _____	
within _____ with proceeds to come from:		2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims:	
<input type="checkbox"/> Sale of Property identified as follows:		Cr. _____ Cr. _____ Cr. _____	
_____		# _____ # _____ # _____	
<input type="checkbox"/> Other:		\$ _____ \$ _____ \$ _____	
_____		3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL:	
Periodic Payments to be made other than, and in addition to the above:		Cr. _____ Cr. _____ Cr. _____	
\$ _____ x _____ = \$ _____		# _____ # _____ # _____	
PROPOSED BASE: \$ 14,772.00		\$ _____ \$ _____ \$ _____	
III. ATTORNEY'S FEES		4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:	
(Treated as § 507 Priorities)		AEELA	
Outstanding balance as per Rule 2016(b) Fee		5. <input type="checkbox"/> Other:	
Disclosure Statement: \$ 2,868.00		6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to:	
Signed: /s/ TRISH MANGUAL ROLDAN		Sistema De Retiro First Bank De Puerto	
Debtor		C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.	
Joint Debtor		11 U.S.C. § 507 and § 1322(a)(2)	
		D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.	
		1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____	
		<input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____	
		Cr. _____ Cr. _____ Cr. _____	
		# _____ # _____ # _____	
		\$ _____ \$ _____ \$ _____	
		2. Unsecured Claims otherwise receive PRO-RATA disbursements.	
		OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)	
		* "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."	
		"Surrenders collateral" : Shares/savings in any Cooperativa/Association/Bank	

Attorney for Debtor **R. Figueroa Carrasquillo Law Office**

Phone: **(787) 744-7699**

Label Matrix for local noticing
0104-3
Case 15-02360-BKT13
District of Puerto Rico
Old San Juan
Fri Dec 18 15:24:02 AST 2015

FIRST BANK DE PUERTO RICO VTQ
MARTINEZ TORRES LAW OFFICES PSC
PO BOX 192938
SAN JUAN, PR 00919-3409

RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN, PR 00928-1382

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

AEELA
PO Box 364508
San Juan, PR 00936-4508

AT&T Services, Inc
IBM Bldg Suite 2000 654 M Rivera Ave
San Juan, PR 00918

Advanced Collection Services, Inc
PO Box 364607
San Juan, PR 00936-4607

American InfoSource LP as agent for
T Mobile/T-Mobile USA Inc
PO Box 248848
Oklahoma City, OK 73124-8848

BANCO POPULAR DE PUERTO RICO
BANKRUPTCY DEPARTMENT
PO BOX 366818
SAN JUAN PR 00936-6818

Banco Popular De PR
PO Box 364445
San Juan, PR 00936-4445

Banco Popular De PR -Mcard
PO Box 3228
San Juan, PR 00936

Banco Popular De PR -Visa
PO Box 362708
San Juan, PR 00936-2708

First Bank De Puerto Rico
PO Box 9146
San Juan, PR 00908-0146

Five Star Club Corp
Isla Verde Mall Ste 218
Carolina, PR 00979-7082

Martinez & Torres Law Offices
Civil Num: ECD2014-0554
PO Box 192938
San Juan, PR 00919-3409

Midland Funding LLC
PO Box 194499
San Juan, PR 00919-4499

Money Express
PO Box 11890
San Juan, PR 00922-1890

Nationalwide Recovery Systems
PO Box 702257
Dallas, TX 75370-2257

Office Max Consumer Credit
PO Box 5174
Sioux Falls, SD 57117

Operating Partners
Civil Num: EDCI2015-15
PO Box 194499
San Juan, PR 00919-4499

Operating Partners
Civil Num: EDCI2015-7
PO Box 194499
San Juan, PR 00919-4499

Premier Bankcard, Llc
c o Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-7999

Rodriguez Fernandez Law Offices PSC
Lodo Osvaldo L Rodriguez Fernandez
PO Box 71418
San Juan, PR 00936-8518

Sallie Mae
PO Box 6180
Indianapolis, IN 46206-6180

Sears
PO Box 6189
Sioux Falls, SD 57117-6189

Sistema De Retiro
PO Box 42003
San Juan, PR 00940-2203

Solmelia
1214 Ave Ashford
San Juan, PR 00907-1331

Sun Com
PO Box 64566
Baltimore, MD 21264-4566

Synchrony Bank
c/o of Recovery Management Systems Corp
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

T-mobile
12920 Se 38th Stre
Bellevue, WA 98006-7305

T-mobile
12920 Se 38th Street
Bellevue, WA 98006-7305

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

MONSITA LECAROS ARIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

TRISH MANGUAL ROLDAN
PO BOX 947
GURABO, PR 00778-0947

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

(d)RELIABLE FINANCIAL SERVICES, INC.
P.O. BOX 21382
SAN JUAN, PR 00928-1382

End of Label Matrix	
Mailable recipients	34
Bypassed recipients	0
Total	34